

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ABN AMRO MORTGAGE GROUP, INC.,

Plaintiff,

- against -

NATIONAL SETTLEMENT AGENCY, INC.,
STEVEN M. LEFF, RACHEL M. LEFF AND
RICHARD A. LEFF,

Defendants.

Case No. 07-CIV-7657

**MEMORANDUM OF LAW IN SUPPORT
OF PLAINTIFF'S MOTION FOR A DEFAULT JUDGMENT
AS AGAINST NATIONAL SETTLEMENT AGENCY, INC.
AND STEVEN M. LEFF**

Thomas J. Kavalier
David N. Kelley
CAHILL GORDON & REINDEL LLP
80 Pine Street
New York, New York 10005
(212) 701-3000

*Attorneys for Plaintiffs ABN AMRO Mortgage
Group, Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ABN AMRO MORTGAGE GROUP, INC.,

Plaintiff,

- *against* -

NATIONAL SETTLEMENT AGENCY, INC.,
STEVEN M. LEFF, RACHEL M. LEFF AND
RICHARD A. LEFF,

Defendants.

Case No. 07-CIV-7657

**MEMORANDUM OF LAW IN
SUPPORT OF PLAINTIFF'S MOTION
FOR A DEFAULT JUDGMENT
AS AGAINST DEFENDANTS
NATIONAL SETTLEMENT AGENCY,
INC. AND STEVEN M. LEFF**

Plaintiff ABN AMRO Mortgage Group, Inc. ("AAMG") respectfully submits this Memorandum of Law in support of its motion for the court to enter a default judgment against Defendants National Settlement Agency, Inc. ("NSA") and Steven M. Leff under Rule 55(b)(2) of the Federal Rules of Civil Procedure.

Plaintiff AAMG filed its Complaint on September 10, 2007. Plaintiff served its Summons and Complaint and its Amended Complaint on Defendant NSA via Federal Express to its General Counsel Richard A. Leff, Esq. and on Defendant Steven M. Leff via Federal Express to his counsel Michael Soshnick, Esq. on September 13, 2007, and filed its Amended Complaint with this Court on September 14, 2007. Additionally, Defendant NSA had notice of the complaint via its President, Defendant Steven M. Leff, who was served as described above, and its Chief Executive Officer, Rachel M. Leff, who was served with the same Summons and Complaint and Amended Complaint via Federal Express to her counsel Lawrence Morrison on September 13, 2007.

No answer or other defense has been filed by Defendant NSA or Defendant Steven M. Leff. Default by NSA and Steven M. Leff was noted and certified by the office of the

-2-

clerk of this court on October 12, 2007. No proceedings related to this default have been taken by the Defendants since default was entered. Under Rule 12(a)(1) of the Federal Rules of Civil Procedure, Defendants' answer to the Amended Complaint was to be served on or before October 1, 2007.

CONCLUSION

The motion for a default judgment against both Defendants NSA and Steven M. Leff should be granted.

Dated: New York, New York
October 12, 2007

CAHILL GORDON & REINDEL LLP

By: 

Thomas J. Kavalier
David N. Kelley
80 Pine Street
New York, New York 10005
(212) 701-3000

*Attorneys for Plaintiff ABN AMRO
Mortgage Group, Inc.*